

# UNITED STATES DISTRICT COURT

Northern DISTRICT OF CALIFORNIA

**FILED**

MAR 18 2004

RICHARD W. WIEKING  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

UNITED STATES OF AMERICA

v.

MICHAEL A. BRADLEY, a/k/a Michael Anthony  
Mazzella Bradley, Michael Mazzella Bradley, Anthony  
Mazzella, Mazzella Anthony and Mark Holland,  
Defendant

## CRIMINAL COMPLAINT

CASE NUMBER:

**51 04 059 PVT**

(Name and Address of Defendant)

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief. Between on or about January 1, 2004 and the present, in the Northern District of California and elsewhere, defendant(s) did, (Track Statutory Language of Offense)

• See Attachment A, which is incorporated herein by reference, which alleges Interference with Commerce by Threats and Mail Fraud

in violation of Title 18, United States Code, Sections 1951 and 1341. I further state that I am a Special Agent with the United States Secret Service and that this complaint is based on the following facts:

• SEE Affidavit in Support of Criminal Complaint

☒ Continued on the attached sheet and made a part hereof.

Approved as to form:

AUSA Christopher P. Sonderby

Signature of Complainant Special Agent Mark Trout  
United States Secret Service

Sworn to before me, and subscribed in my presence

March 18 2004

at San Jose, California

Date

City and State

HON. PATRICIA V. TRUMBULL  
U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**SEALED BY ORDER  
OF COURT**

**AFFIDAVIT IN SUPPORT OF ISSUANCE OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Mark Trout, Special Agent of the United States Secret Service, having been duly sworn,  
do depose and state the following:

**INTRODUCTION**

1. I am a Special Agent of the United States Secret Service and have been so employed since 2001. I am currently assigned to the San Jose Resident Office, CA, and am trained and authorized to investigate the offenses alleged herein. I received extensive training at the United States Secret Service, James J. Rowley Training Center in the matters of electronic crimes. Additionally, I have received training in the detection of counterfeit U.S. currency, credit card fraud and identity theft. I have been assigned to the San Francisco Electronic Crimes Task Force, which is managed by the U.S. Secret Service.

2. As part of my duties, I investigate high technology crimes, including computer intrusions, intellectual property violations, Internet fraud, Distributed Denial of Service attacks, virus propagations and other types of malicious computer activity. I am authorized to investigate violations of laws of the United States and I am a law enforcement officer with authority to execute arrest and search warrants issued under the authority of the United States.

3. I make this affidavit in support of the issuance of a criminal complaint and arrest warrant against the following individual:

NAME:	MICHAEL ANTHONY BRADLEY a/k/a Michael Anthony Mazzella Bradley, Michael Mazzella Bradley, Anthony Mazzella, Mazzella Anthony and Mark Holland
DOB:	July 5, 1971
SSN:	559-19-3072

ADDRESS: 5805 Oak Bend Lane, Unit 303  
Oak Park, California 91377-5645

4. As set forth more fully herein, there is probable cause to believe that defendant BRADLEY has committed violations of Title 18, United States Code, Sections 1951 (Hobbs Act) and 1341 (Mail Fraud). In summary, defendant BRADLEY devised and executed a scheme to defraud and extort money from Google, Inc., the Internet company best known for its free search engine, by devising a software program that automates fraudulent "clicks" on "cost-per-click" advertisements Google places on various Web sites under a program called Google AdServe. These fraudulent clicks, in turn, cause Google to make payments to Website publishers under the AdServe program – payments that are supposed to be made only for legitimate "clicks" made by a legitimate Web surfer. Defendant BRADLEY has stated that he has used his software to cause Google to make payments of approximately \$60,000, and has threatened that he will "destroy" Google financially by releasing his software program to the public unless he receives a payment of \$100,000 from Google.

#### RELEVANT STATUTES

##### *Interference with Commerce by Threats or Violence*

5. Title 18, United States Code, Section 1951 (the "Hobbs Act") provides, in relevant part:

(a) Whoever in any way or degree obstructs, delays, or affects commerce or the movement of any article or commodity in commerce, by robbery or extortion or attempts or conspires to do so, or commits or threatens physical violence to any person or property in furtherance of a plan or purpose to do anything in violation of this section shall be fined under this title or imprisoned not more than twenty years, or both.

(b) As used in this section—

\* \* \*

(2) The terms extortion means the obtaining of property from another, with his consent, induced by wrongful use of actual or threatened force, violence, or fear, or under color of official right.

(3) The term commerce means . . . all commerce between any point in a State, Territory, Possession, or the District of Columbia and any point outside thereof; all commerce between points within the same State through any place outside such State; and all other commerce over which the United States has jurisdiction.

6. Under the Hobbs Act, I am aware that the term "property" includes money, and that the term "fear" includes fear of economic loss or damage.

#### *Mail Fraud*

7. Title 18, United States Code, Sections 1341 prohibits the use of the mails to further a scheme or artifice to defraud.

#### SOURCES OF INFORMATION USED IN THIS AFFIDAVIT

8. The facts set forth below are based upon my own personal observations, my own training and experience, reports, audio tapes, emails and other information provided to me by the victim, information obtained from my conversations with other law enforcement agents knowledgeable in computer disciplines, and records I have obtained. This affidavit is intended to show that there is probable cause for the issuance of a criminal complaint and an arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter.

#### TECHNICAL BACKGROUND

##### Internet Service Providers & IP Addresses

9. Many individuals and businesses obtain their access to the Internet through Internet Service Providers ("ISPs"), which provide their customers with access to the Internet using

telephone or other telecommunications lines; provide Internet e-mail accounts that allow users to communicate with other Internet users by sending and receiving electronic messages through the ISPs' servers; remotely store electronic files on their customers' behalf; and provide other services unique to each particular ISP.

10. ISPs maintain records pertaining to their subscribers. These records may include identifying and billing information, account access information in the form of log files, e-mail transaction information, posting information, account application information, and other information both in computer data format and in written record format.

11. The Internet Protocol address (or "IP" address) is a unique numeric address used by computers on the Internet. An IP address looks like a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses, and assign them to subscribers to permit Internet access.

12. IP numbers for individual user accounts are usually assigned "dynamically": i.e., each time the user dials into the ISP to connect to the Internet, the customer's machine is assigned one of the available IP addresses controlled by the ISP. The customer's computer retains that IP address for the duration of that session (i.e., until the user disconnects), and the IP address cannot be assigned to another user during that period. Once the user disconnects, however, that IP address becomes available to other customers who dial in thereafter. Thus, an individual customer's IP address normally differs each time he dials into the ISP. By contrast, an ISP's

business customer, and subscribers to certain broadband services such as a Digital Subscriber Line ("DSL"), will commonly have a permanent, 24-hour Internet connection to which a "static" (i.e., fixed) IP address is assigned. DSL service may be provided on a telephone line that has been conditioned to supply the service, allowing that line to be used for continuous Internet connectivity as well as regular telephone service.

13. These source IP addresses are, in the computer network context, conceptually identical to the origination phone numbers captured by traditional trap and trace devices installed on telephone lines. Just as traditional telephonic trap and trace devices may be used to determine the source of a telephone call (and thus the identity of the caller), a combination of hardware and software can be used to ascertain the source addresses of electronic connections to an Internet computer, and thereby to identify and locate the originator of the connection.

14. A router is a device that determines the next network point to which a data packet should be forwarded enroute towards its next destination. The router is connected to at least two networks and determines which way to send each data packet based on its current understanding of the state of the networks it is connected to. Routers create or maintain a table of the available routes and use this information to determine the best route for a given data packet.

#### BACKGROUND ON GOOGLE AND ITS "ADSENSE" PROGRAM

15. According to its Web site at [www.google.com](http://www.google.com), Google, Inc. is a privately held California company focused on providing Internet search services for Internet users worldwide. In addition to providing services to individual Internet users, Google also offers corporate clients advertising services that are targeted by keyword and with search technology that facilitates finding information on the Internet.

16. Google offers an advertising program to Website publishers called Google AdSense as one method of generating revenue. Under the AdSense program, Website publishers agree to allow Google to place advertisements on Websites based on Google's proprietary search and page-ranking technologies, which employs a "sophisticated algorithm that includes such factors as keyword analysis, word frequency, font size, and the overall link structure of the web . . . to precisely match Google ads to each page." In exchange, Google pays the Website publishers a fee for every instance a unique Internet user clicks on the ads. These are known as "cost-per-click" ads.

17. To participate in the AdSense program, Website publishers must receive approval from Google after submitting an application, which includes an agreement to abide by AdSense's Online Standard Terms and Conditions. These terms prohibit a participating Website publisher from "generat[i]ng fraudulent impressions of or fraudulent clicks on any Ad(s), including but not limited to through repeated manual clicks, the use of reobots or other automated query tools and/or computer generated search requests, and/or the fraudulent use of other search engine optimization services and/or software." Similarly, Google's AdSense Program Policies, which are incorporated into the Terms and Conditions and accessible on its Web site, provide that "[a]ny method that artificially and/or fraudulently generates clicks is strictly prohibited."

18. According to Google's AdSense FAQ number 8, which is also incorporated into the Terms and Conditions and accessible on its Web site, states that Google "monitors clicks on Google AdWords ads to prevent abuse of the Google AdSense program. Google's proprietary technology analyzes clicks to determine whether they fit a pattern of fraudulent use intended to artificially drive up an advertiser's clicks or a publisher's earnings."

19. Once an AdSense application has been approved, a Website publisher is able to copy and paste AdSense HTML ad code into its Web pages and begin displaying ads. Thereafter, each legitimate click obligates Google to pay the Website publisher a fee. (Google itself receives a fee from the advertisers for using its technology to strategically place the ads on Websites.)

#### DESCRIPTION OF CRIMINAL ACTIVITY

##### Michael Bradley's E-Mail Contact with Google

20. On March 8, 2004, Marty Lev, Manager of Safety and Security for Google contacted Chris Von Holt, Resident Agent in Charge of the United States Secret Service for San Jose. Mr. Lev told Special Agent Von Holt that Google <sup>is</sup> ~~of~~ a March 2, 2004, email from a "Mark Holland" (who later was identified as Michael Bradley) at the email address "scantek@hotmail.com" to the general AdSense email address at adsense-adclicks@google.com with a subject line of "Auto Clicks." The email, including some of the pertinent header information, reads as follows:

Received: from 68.122.153.182 by by9fd.bay9.hotmail.msn.com with HTTP;

Tue, 02 Mar 2004 00:02:04 GMT

X-Originating-IP: [68.122.153.182]

X-Originating-Email: [scantek@hotmail.com]

X-Sender: scantek@hotmail.com

From: "Mark Holland" <scantek@hotmail.com>

To: adsense-adclicks@google.com

Subject: Auto Clicks

Date: Mon, 01 Mar 2004 16:02:04 -0800

Mime-Version: 1.0

Content-Type: text/plain; format=flowed

Message-ID: <BAY9-F704nDVwEdkCBD0002fbeb@hotmail.com>

X-OriginalArrivalTime: 02 Mar 2004 00:02:05.0212 (UTC)

I am a programmer, and was hired to write an autoclick software for the google AdSense program. The software will surf a site, and click on



various ads, all coming from thousands of different IPs, this being untrackable by google.

We agreed he would pay me 100% of what it could earn during testing of the software. During testing/writing of the software, my client was able to set up 10 websites and AdSense accounts, and was able to earn over \$3,000 per site, this totaling over \$30,000 per month, we let the software run for 2 months, now he refuses to pay me for the software, (its ok, he doesnt have a copy of it)

So I feel the software was worth \$60,000. He will not pay me for it, so I am not giving it to him, now I have a choice to make, because I spent that time writing it, I can either sell it on the internet for \$250 a pop, until I make my money or I can set up several websites and AdSense accounts, and earn a huge amount on money. I was thinking about 10 sites over 4 months would yield in excess of \$120,000 but I don't want to waste my time.

Ok, the bottom line, would google like to buy the software and all source code with all rights, and put me under contract to not disclose the interworkings nor selling of any such software?

Just a thought, I am going to Hawaii for the next week, let me know. I am cleaning up the code, and will put it up for sale when I get back.

21. Special Agent Mark Trout subsequently performed a search of a publicly-available database regarding the IP address 68.122.153.182, which is identified as the originating address of the email set forth above. This query revealed showed that this IP address was assigned to SBC Internet Services. On or about March 16, 2004, Special Agent Trout obtained subscriber information from SBC for the account assigned that IP address, which showed that it was assigned to subscriber Michael Bradley, who had DSL Internet service at 5805 Oak Bend, Apt. 303, Oak Park, California 91377, telephone number (818) 597-9159, in March 2004.

22. Bradley communicated with Google by email on March 9, 2004. Bradley sent the following email to one of Google's engineers:

Received: from 68.122.153.182 by by9fd.bay9.hotmail.msn.com with HTTP;

Tue, 09 Mar 2004 01:22:13 GMT

X-Originating-IP: [68.122.153.182]

X-Originating-Email: [scantek@hotmail.com]

X-Sender: scantek@hotmail.com

From: "Mark Holland" <scantek@hotmail.com>

To: adsense-adclicks@google.com

Subject: Re: [#7604122] Auto Clicks

Date: Mon, 08 Mar 2004 17:22:13 -0800

Hi {Redacted - name of Google engineer},

This works for me, I will be in the financial district in the morning, then will head down to your offices.

May I ask why only you and engineers? I am kinda shocked your legal department is not going to sit in on this.

Anyway, I will be there.

--Mark

The originating IP address for this email is 68.122.153.182, which SBC records show was registered to Michael Bradley at the SUBJECT PREMISES.

Recorded Meeting at Google on March 10, 2004

23. Mr. Lev of Google stated that Bradley agreed to meet with Google engineers on March 10, 2004, at Google's corporate offices at 2400 Bayshore Parkway, Mountain View, California, to discuss the details of his email and provide a demonstration of his software.

24. On March 10, 2004, Google set up an interview room with video cameras in advance of a scheduled 3:00 p.m. meeting between Bradley and two Google engineers.

Google provided a laptop computer for the subject to perform his demonstration, and set up video-monitoring equipment. Prior to the meeting, Special Agent Von Holt placed a digital audio recording device in the pocket of one of the engineers to record the meeting, and an audio transmitter was also placed in the room. Special Agent Von Holt then observed the meeting by video and audio feed in an adjoining room.

25. At approximately 2:45 p.m. on March 10, 2004, a subject who identified himself as "Michael" appeared at building 41 of Google's campus to meet with the engineers. I have listened to a tape of this meeting. Over the next hour or so, the subject stated as follows, among other things:

- a. His real name was Michael, not "Mark Holland," and he had residences in Las Vegas and Southern California.

- b. He was a computer programmer who had written software known as Google Clique that would exploit Google's AdSense program. He was originally hired to write the program for an unidentified client, who was to pay him \$60,000, which was the amount he had earned while writing and testing the program. The client ultimately refused to pay him, so he was offering it to Google.

- c. His software program generates clicks on the AdSense program that "mimics a surfer," "looks like real traffic," and "hides" the true origin of the clicks. In general, he explained that his program uses compromised computer routers to generate the clicks in random and infrequent patterns so as to "fly under the radar" of Google's monitoring.

d. He once paid a technical employee at Hotmail Corporation \$50,000 for a database of Hotmail email addresses for purposes of spamming, an area where in which he made his "first million." He also stated that he once "sucked all of monster.com's" database of resumes by exploiting an unexpired cookie of a former user.

e. He asked the two engineers: "Are you guys at all threatened by this?" He later said that "I'm not threatening you guys," but added that if Google did not pay him \$100,000, he would sell it to the "top 100 spammers," and Google would be "out \$5 million in six months." He said he was offering it to Google because he "had a conscience."

f. After repeating his request for \$100,000, he stated that the public release of his software would "destroy Google." He explained that Google's advertisers "would be pissed" because they would be able to tell whether they were paying for legitimate or bogus "clicks" on their ads. Accordingly, he stated he needed "hush money – no I'm just joking."

g. On at least two occasions, he asked the engineers, "where's my check?" If he did not receive the money from Google, he would sell it to "spammers" and "spend the next couple of weeks in a strip club."

h. He stated that "this feels like a blackmail session." At another point, he stated that "you think I'm joking, that's the funny part."

i. In addition to selling Google the source code for the software, he stated that he would offer his consulting services for a year, and that he "knows how to solve false clicks for Google."

26. During the recorded meeting on March 10, 2003, Bradley also demonstrated the software for the two engineers on a laptop provided by Google. According to the engineers, the following occurred, among other things, during the demonstration:

a. Bradley logged into dsl.irvnc.pacbell.net, which is located at the IP address 68.122.153.182, which was the same Login IP as recorded by Google on Bradley's own AdSense account. Bradley had a directory on his server called mbradley.

b. Bradley's showed how the software prompts the user to enter the desired number of simulated Google surfers and a desired ratio of "impressions," or Web page views, per click. The format is 1:10:20, which means that one click will be generated randomly between 10-20 impressions.

c. Once the software starts, it uses compromised computer routers to "tunnel" the http requests to Google and conceal their true source. In my experience, I know that the use of compromised computer routers indicates the unauthorized access to a computer.

27. Upon his departure, the Google engineers informed Bradley that they would consult with others at Google and get back to him. Bradley was observed by Special Agent Mark Trout leaving the Google campus in Mountain View in a 2002 Jeep, bearing the license plate 4YDR081. Records provided by the California Department of Motor Vehicles show the registered owner of that vehicle to be Michael A. Bradley, and list the SUBJECT PREMISES as his address.

Contacts Following March 10, 2004 Face-to-Face Meeting

28. Bradley communicated with Google by email following the March 10, 2004 meeting. On March 12, 2004, Bradley sent the following email to one of Google's engineers:

Received: from mbdesktop (adsl-68-122-153-182.dsl.irvnca.pacbell.net [68.122.153.182])  
(authenticated bits=0)  
by fido.snazzlehoster.com (8.12.8/8.12.8) with ESMTP id  
i2CMDYgc006738  
for <adsense-adclicks@google.com>; Fri, 12 Mar 2004 14:13:35  
-0800  
From: "Mike Bradley" <mbradley@mazmed.net>  
To: "Google AdSense" <adsense-adclicks@google.com>  
Subject: Re: [#7604122] Auto Clicks  
Date: Fri, 12 Mar 2004 14:13:47 -0800  
Message-ID:  
<MFEOLBCJBLHPDLPDKMIEOPCFAA.mbradley@mazmed.net>

Attn: [Redacted – name of Google engineer]

Hi [Redacted – name of Google Engineer],

I tried to call, but I guess I got your voice mail. Well I am sorry that your company could not put me in contact with someone that is capable of making a decision. But I can not sit and wait to see what google wants to do, I am moving forward with my project, if either you or someone who has the ability to make a decision wants to contact me, please feel free, but to be honest, It kinda was a waste of my time to fly out there and meet with you guys, I kinda feel like you [google] *(brackets in original)* didn't take me seriously. **To the point, I am able to make a decision, and I am releasing the software on Monday to the top 150 spammers.** [emphasis added]. I have paid for ad space on major bulk mail houses.

Here is the demo site, if you are interested:  
<http://www.myhq.info/clique>

Well, if google still wishes to purchase all rights to the software, source code, etc, let me know, but please, I beg, don't make be globe trot for another wasted day.

29. The originating IP address for this email is 68.122.153.182, which SBC records show was registered to Michael Bradley at the SUBJECT PREMISES.

30. I have viewed the "demo site" referenced in the March 12 email described above at [www.myhqy.info/cliqye](http://www.myhqy.info/cliqye). That Web site states as follows about Google Clique:

a. "Google Clique is an auto click software for the Google Adsense program. Clique uses the Holland tunneling engine, that allows Clique to surf and click on Google . . . [from] hundreds of thousands of IP's around the globe, completely untracable!"

b. "What kind of revenue can Google Clique generate for you? Well, from our testing it is best to stay at around \$3,000/month per Google Adsense account. It is also advised that you set up multiple accounts, we have been able to generate in excess of \$30,000 per month using Google Clique across 10 Adsense accounts. Also, don't try and push it, stay at or below 1.2% click rate, this is proven, and the google engineers have told me they look for higher click rates."

c. "Why am I so confident this works? **Because I was personally invited to visit Google and demo the software for them, and trust me, they are so far behind in their tracking system . . . they were very nice to me and we sat down and I did the demo of Google Clique . . . they found Google Clique to be a serious threat to their company.**" [Emphasis added.]

d. "Holland Engine was the originally written to allow spammers to conceal their originating IP from mailservers and to keep it from appearing [sic] in email headers . . . and now we bring it to you with Google Clique."

e. "Google Clique has 2 surfers, Click, and Dummy. Dummy surfer, this surfer does nothing but increment your ad impressions, thus keeping your click rates down low. Click surfer, this surfer, will surf you [sic] pages, then click an ad. By allowing the Click and Dummy surfer to actually [sic] surf, you are showing a surf, and not just clicks on an ad. **Google has ways to detect simple autoclick software, and by allowing Clique to surf before clicking an ad, we can easily get past this. (trust me, this came up in my meeting with Google)**" [Emphasis added.]

f. "Reaper will be available by the first of April, and will allow you to kill off any of your competition. Reaper will use the Holland Engine, from one single source you specify, and will click the SHIT out of the ads on your competitions web site . . . thus causing a huge spike in the Adsense program and will cause them to lose their accounts rather quickly . . . So get Reaper as soon as its available, and start fucking the competition!"

31. A publicly-available database concerning the domain name "www.myhq.info" indicates that the registrant is an Anthony Mazzella at 7357 Variel Ave.5, Canoga Park, California 91303. "Anthony Mazzella" is a known alias of Michael Bradley. Records obtained from the California Department of Motor Vehicles show that a "Michael Anthony Mazzella Bradley" provided the 7357 Variel Avenue address in Canoga park as his residence as of July 1999.

32. On March 12, 2004, a Google engineer received another email from "Mike Bradley," as follows:

Fri, 12 Mar 2004 16:16:05 -0800



Received: from 68.122.153.182 by bay9-dav44.bay9.hotmail.com with DAV;

Sat, 13 Mar 2004 00:16:05 +0000

X-Originating-IP: [68.122.153.182]

X-Originating-Email: [scantek@hotmail.com]

X-Sender: scantek@hotmail.com

From: "Mike Bradley" <scantek@hotmail.com>

To: "Google AdSense" <adsense-adclicks@google.com>

References: <#14.74079a.46d345d0.404e5af2.1@google.trakken.com>

Subject: Re: [#7604122] Auto Clicks

Date: Fri, 12 Mar 2004 16:16:03 -0800

Hey *MT*

I just left you a voice mail. This is not cool what google just did to my friend. You guys cut him a check a couple weeks ago, then terminated his account, and now you reversed the check? The dude is freakin out, his bank account is now -\$1,500 and his rent and car payment bounced, this is totally fucked up.

And since google is no longer responding to me, and had wasted my time, I too am a little bit irritated. So I am now thinking about just releasing the software into the public at no charge, I am also writing a program called reaper that will fuck other peoples accounts and get them terminated. This is not cool what you guys did to the guy. Nor is it cool how you wasted my time by me flying up to see you guys and nothing came of it.

I do expect (sic) to hear from someone in google by monday, or this software is going full force into the public. here is the demo:

<http://www.myhq.info/clique>

Call me at home, 818-597-9159

33. The originating IP address for the email identified above is 68.122.153.182, which SBC records show was registered to Michael Bradley at the SUBJECT PREMISES.

34. There was an additional exchange of emails between "Mike Bradley" and the

Google engineers, as well as another recorded telephone call on March 15, 2004 with an individual introduced to Bradley as Chris Vaughn, VP of Products. In fact, Vaughn was Special Agent Chris Von Holt. In this March 15 conversation, Bradley stated that he hoped Google was not afraid of him, and agreed to meet with Google representatives again in Mountain View on Thursday, March 18.

Evidence of Bradley's Fraudulent Use of his "Google Clique" Software

35. Marty Lev, Google's Manager of Corporate Security and Safety, provided Secret Service Special Agents with information and records showing that Michael Bradley had at least the following two accounts under the AdServe program:

Web site:	<a href="http://www.mazmed.net">www.mazmed.net</a>
Email:	<a href="mailto:mbradley@mazmed.net">mbradley@mazmed.net</a>
Billing Address:	Mike Bradley Ken Group Inc. 5805 Oak Bend Ln. Suite 303 Oak Park, CA 91377 United States 818-597-9159
Created:	November 12, 2003

Web site:	<a href="http://www.hairreview.com">www.hairreview.com</a>
Email:	<a href="mailto:info@hairreview.com">info@hairreview.com</a>
Billing Address:	Pagoda Group 723 S. Casino Center Blvd. Las Vegas, NV 89101 United States 818-597-9159
Created:	February 12, 2004

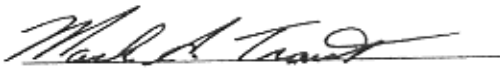
36. According to Lev, approximately \$3,600 worth of "clicks" were generated on the [www.mazmed.net](http://www.mazmed.net) account, and Google Check No. 52476, dated January 27, 2004, in the amount \$768.75 was mailed to Mike Bradley at 5805 Oak Bend Ln. Suite 303, Oak

Park, CA 91377, on approximately January 27, 2004. I have seen an electronic image of this check, which was negotiated by the recipient. Lev has stated that the Google checks were issued in Bradley's name for the balance of the \$3,600, but were canceled prior to payment as a result of Google's fraud protection systems.

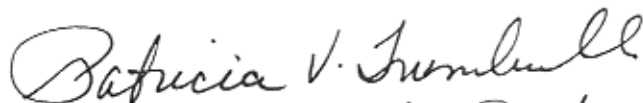
37. A publicly-available database shows that the registrant for the domain names www.mazmed.net and www.hairreview.com is a "Mazella Anthony" at the SUBJECT PREMISES. Further, the IP address for those Web sites is identified as 68.122.153.178. Records provided by SBC indicate that Michael Bradley has been assigned that IP address and utilizes it from the SUBJECT PREMISES.

#### REQUEST FOR SEALING

38. Because this investigation is continuing, disclosure of the search warrant, this affidavit, and/or this application and the attachments thereto will jeopardize the progress of the investigation. Accordingly, I request that the Court issue an order that the search warrant, this affidavit in support of application for search warrant, the application for search warrant, and all attachments thereto be filed under seal until further order of this Court.

  
Special Agent  
United States Secret Service

Sworn to and subscribed before me  
on this 18 day of March, 2004

  
U.S. Magistrate Judge

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Hon.  
United States Magistrate Judge

PVT